

Counsel Listed on Next Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDWARD ABRAM, JR., NAJLA
WAHEED, RICHARD ZEMEL, and
ROSALYN CEASAR, individually and on
behalf of all others similarly situated, and on
behalf of the general public,

Plaintiffs,

vs.

AMERICAN HOME MORTGAGE
INVESTMENT CORP., AMERICAN HOME
MORTGAGE CORP., and DEFENDANT
DOES 1-50,

Defendants.

Case No. C07-03252

CLASS ACTION

STIPULATION TO EXTEND
TIME FOR DEFENDANTS
AMERICAN HOME MORTGAGE
INVESTMENT CORP. AND
AMERICAN HOME MORTGAGE
CORP. TO RESPOND TO
PLAINTIFFS' COMPLAINT

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22 AMERICAN HOME MORTGAGE INVESTMENT CORP. and
23 AMERICAN HOME MORTGAGE CORP.
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1 Plaintiffs EDWARD ABRAM, JR., NAJLA WAHEED, RICHARD ZEMEL and
2 ROSALYN CEASAR, individually and on behalf of all other similarly situated individuals
3 ("Plaintiffs") and Defendants AMERICAN HOME MORTGAGE INVESTMENT CORP. and
4 AMERICAN HOME MORTGAGE CORP. (Defendants collectively referred to herein as
5 "AHM") (Plaintiffs and Defendants collectively referred to herein as "the Parties") hereby
6 stipulate to the following extension of time for AHM for respond to Plaintiffs' Complaint for
7 Damages, Restitution and Injunctive Relief ("Complaint"):

- 8 1. Plaintiffs filed this action in the United State District Court, Northern District of
9 California on June 20, 2007. Plaintiffs served AHM with a copy of the Complaint on
10 June 22, 2007. The last day for AHM to respond to Plaintiffs' Complaint is July 12,
11 2007.
- 12 2. Pursuant to Local Rule 6-1(a), the Parties hereby stipulate that AHM will have an
13 extension of time to respond to Plaintiffs' Complaint until August 13, 2007. Local Rule
14 6-1(a) provides that "[p]arties may stipulate in writing, without a Court order, to extend
15 the time within which to answer or otherwise respond to the complaint . . . provided the
16 change will not alter the date of any event or any deadline already fixed by the Court."
17 Civ. L.R. 6-1(a). This stipulation will not affect the dates, if any, set by the Court in this
18 matter.
- 19 3. To the extent permitted by law, the Parties further hereby stipulate that as to individual
20 class members who "opt in" to this litigation pursuant to 29 U.S.C. § 216(b), if any, the
21 applicable effective date of any such "opt in" (i.e., the claim being commenced for
22 purposes of 29 U.S.C. § 256) shall be thirty-two (32) days preceding the time written
23 consent to become an opt-in plaintiff is filed with the Court. This modification is in
24 allowance for the stipulated extension of time set forth in paragraph 2 above. However,
25 in no case shall any consent to join this litigation be deemed to have been filed with the
26 Court prior to the date of filing of the Complaint.

27 IT IS SO STIPULATED.
28

1 DATED: July 12, 2007

NICHOLS KASTER & ANDERSON, LLP

2 By: 

3 Bryan J. Schwartz
4 Attorneys for Individual and
5 Representative Plaintiffs

6 DATED: July 12, 2007

JACKSON LEWIS LLP

7 By: 

8 Scott O. Osborne
9 Attorneys for Defendants
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CERTIFICATE OF SERVICE

CASE: EDWARD ABRAM, JR., et al v. AMERICAN HOME MORTGAGE INV., et al.
CASE NO.: USDC-ND CA C07-03252
CLIENT: 113125

I, Jeffrey B. Meade, declare that I am employed with the law firm of Jackson, Lewis, LLP, whose address is 121 SW Salmon Street, 11th Floor, Portland OR 97204; I am over the age of eighteen (18) years and am not a party to this action.

On July 12, 2007, I served the attached STIPULATION TO EXTEND TIME FOR DEFENDANTS AMERICAN HOME MORTGAGE INVESTMENT CORP. AND AMERICAN HOME MORTGAGE CORP. TO RESPOND TO PLAINTIFFS' COMPLAINT in this action by placing true and correct copies thereof, enclosed in sealed envelope(s) addressed as follows:

Bryan J. Schwartz
NICHOLS KASTER & ANDERSON, LLP
One Embarcadero Center, Suite 720
San Francisco, CA 94111

Adam T. Klein
Jack A. Raisner
OUTTEN & GOLDEN, LLP
3 Park Avenue, 29 Floor
New York, New York 10016

Matthew C. Helland
Paul J. Lukas
Donald H. Nichols
NICHOLS KASTER & ANDERSON, PLLP
80 South Eighth Street, Suite 4600
Minneapolis, MN 55402

☒ BY MAIL: United States Postal Service by placing sealed envelopes with the postage thereon fully prepaid, placed for collection and mailing on this date, following ordinary business practices, in the United States mail at Portland Oregon.

☐ BY HAND DELIVERY: I caused such envelope(s) to be delivered by hand to the above address.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 12, 2007, at Portland, Oregon.



Jeffrey B. Meade

PROOF OF SERVICE
STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT